

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

|                                 |   |                          |
|---------------------------------|---|--------------------------|
| MICHAEL KEETON, et al.,         | : |                          |
|                                 | : |                          |
| Plaintiffs,                     | : | Case No. 2:09 CV 1085    |
|                                 | : |                          |
| vs.                             | : | JUDGE MARBLEY            |
|                                 | : |                          |
| TIME WARNER CABLE, INC., et al. | : | MAGISTRATE JUDGE DEAVERS |
|                                 | : |                          |
| Defendants.                     | : |                          |

**JOINT MOTION FOR APPROVAL OF SETTLEMENT OF FAIR LABOR  
STANDARDS ACT COLLECTIVE ACTION CASE UNDER §216(b) AND TO PROVIDE  
COURT WITH SETTLEMENT TERMS *IN-CAMERA***

For the reasons set forth below, the parties respectfully request the Court approve the terms of their agreed upon settlement of this case. The parties also request that the Court review and consider the terms of the settlement *in-camera*, thus preserving confidentiality.

**MEMORANDUM IN SUPPORT OF MOTION**

This case was brought pursuant to the Federal Fair Labor Standards Act, and seeks overtime and minimum wages for installers employed at Reno Services, LLC, a contractor for Defendant Time Warner Cable LLC. Defendants deny that their practices violate the FLSA.

In a mediation of the instant case before the Honorable Richard McQuade (former United States District Court Judge), the parties reached a complete settlement of claims for all the named Plaintiffs, and the individual who opted in to the case. The settlement would result in the dismissal of the case and claims with prejudice. (The Court would retain jurisdiction for a modest period of time after approval of the settlement in order to enforce any terms as needed).

The parties believe they have reached a full and fair settlement of all claims but also wish to preserve confidentiality of the settlement terms. Accordingly, the parties propose to submit to the Court the complete settlement agreement *in-camera* for the Court's review, and via telephone conference with the Court, or if the Court prefers, in person conference, answer any questions the Court may have about the agreement, if needed.

For these reasons, the parties respectfully request that the Court approve the parties proposed settlement. A proposed Order is attached hereto.

Respectfully submitted:

/s/ John S. Marshall

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